IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA PENSION PLAN, *et al.*,	)))	
Plaintiffs,	))	CIVIL ACTION
vs.	))	NO. 14 C 7476
LINDA E. ROSS, d/b/a PRECISE STEEL, INC.,	)))	JUDGE CHARLES R. NORGLE, SR.
Defendant.	))	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LINDA E. ROSS, d/b/a PRECISE STEEL, INC., in the total amount of $4,042.47, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of $968.00.

On October 2, 2014, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to Brandon Ross, son) at her residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on October 23, 2014. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com

CERTIFICATE OF SERVICE

        The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this <u>14th</u> day of <u>November 2014</u>:

        Ms. Linda E. Ross
        329 Kingston Road
        Genoa, IL 60135

        /s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
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